

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

ORIGINAL

FILE

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

RECEIVED

JAN 29 1993

In the Matter of

Redevelopment of Spectrum to  
Encourage Innovation in the Use  
of New Telecommunications Technologies

)  
)  
)  
)  
)

ET Docket 92-8

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**MOTION FOR LEAVE TO FILE SUPPLEMENTAL COMMENTS**

GTE Service Corporation, on behalf of its domestic, affiliated, telephone, equipment and service companies ("GTE"), pursuant to Section 1.415(d) of the Commission's Rules hereby moves for leave to file Supplemental Comments in the above-captioned rulemaking proceeding.

GTE's Supplemental Comments are submitted in order to qualify a statement made by Alcatel Networks Systems, Inc. ("Alcatel") in its Reply Comments to the Further Notice of Proposed Rulemaking ("FNPRM") concerning GTE's position with respect to Alcatel's most recent proposal for a restructuring of the 4 GHz band to accommodate displaced 2 GHz users. Alcatel states in its Reply Comments that GTE does not oppose adoption of the 4 GHz plan put forth by Alcatel in its Reply Comments. GTE wishes to clarify the nature of its response to Alcatel, and the attached Supplemental Comments serve to correctly state the position of GTE with respect to the proposed plan.

Acceptance of the attached Supplemental Comments for filing will enhance the clarity of the record before the Commission, and will not injure any party or delay the outcome of this proceeding.

No. of Copies rec'd  
List A B C D E

0+4

**CONCLUSION**

For the foregoing reasons, GTE submits that the Commission should accept the attached Supplemental Comments for filing in this proceeding.

Respectfully submitted,

**GTE SERVICE CORPORATION**, on  
behalf of its domestic, affiliated,  
telephone, equipment and service  
companies

By: 

Daniel L. Bart  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036  
(202) 463-5212

January 29, 1993

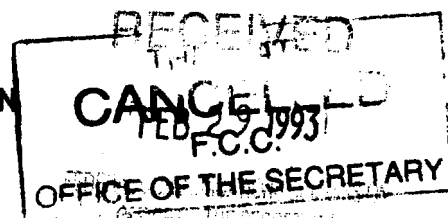
Their Attorney

RECEIVED

JAN 29 1993

EX PARTE OR LATE FILED

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554



In the Matter of )  
 )  
Redevelopment of Spectrum to ) ET Docket 92-9  
Encourage Innovation in the Use )  
of New Telecommunications Technologies )

### SUPPLEMENTAL COMMENTS OF GTE SERVICE CORPORATION

GTE Service Corporation, on behalf of its domestic, affiliated, telephone, equipment and service companies ("GTE"), herein submits these supplemental comments to clarify a statement made by Alcatel Network Systems, Inc. ("Alcatel") in its Reply Comments to the Further Notice of Proposed Rulemaking ("FNPRM") in the above-captioned proceeding.

In its Reply Comments, Alcatel states that GTE does not oppose adoption of Alcatel's most recent proposal to restructure the 4 GHz band in order to accommodate displaced 2 GHz users.<sup>1</sup> GTE was requested to review and respond to the Alcatel proposal before the Reply Comments to this proceeding were due. In the short time frame available, GTE reviewed the plan and responded to Alcatel by stating that GTE was not prepared to oppose the plan outright. GTE indicated that the proposal appeared to alleviate the more adverse conditions present in the previous proposal set forth by Alcatel, but that several conditions or caveats could be required before GTE could accept or

---

<sup>1</sup> At page 3 of its Reply Comments Alcatel states: "GTE Service Corporation . . . considers ANS' approach to be the best compromise and will not oppose its adoption."

endorse the plan's adoption. GTE's response to Alcatel should, therefore, not be construed as an endorsement of the proposal at this time.

GTE believes that further study of the proposal is needed, and that concerns expressed by other satellite interests merit full consideration by the Commission before a determination is made with respect to the 4 GHz band. GTE, therefore, submits that its initial response to Alcatel should not be misconstrued as supportive of the plan's adoption as is. In fact, GTE's intention was to indicate that it was not prepared to outright oppose the plan, but that further study of the proposal was needed to ensure that satellite users' concerns and service requirements were adequately addressed.

Respectfully submitted,

**GTE SERVICE CORPORATION**, on  
behalf of its domestic, affiliated,  
telephone, equipment and service  
companies

By: 

Daniel L. Bart  
1850 M Street, N.W.  
Suite 1200  
Washington, D. C. 20036  
(202) 463-5212

January 29, 1993

Their Attorney

## Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Motion for Leave to File Supplemental Comments" and "Supplemental Comments of GTE Service Corporation" have been mailed by first class United States mail, postage prepaid, on the 29th day of January, 1993 to all parties of record.

  
Jennifer R. McCain